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Organization:
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Comments: To the Forest Supervisor and District Ranger July 16, 2025

Subject: Urgent Objection to Failure to Follow Mandated Directives for Recreation Management and Timber Production

Dear Forest Supervisor Brooke and District Ranger Holman

Pursuant to 36 CFR [sect] 218, I submit this formal objection to the Draft Decision Notice (Draft DN) and Finding of No Significant Impact (FONSI) for the North Fork Smith Restoration Project. My comments were submitted during the designated public comment period and included concerns related to recreation, trail infrastructure, access roads, and ecosystem integrity. The final decision fails to adequately address these issues and introduces new ones that raise serious concerns under NEPA, the Wild and Scenic Rivers Act, and Forest Service regulations.

I. Siuslaw National Forest, Failure to Implement Immediate Mandates

This letter serves as a direct request to follow the specific mandates provided not only by the Chief of the Forest Service but also by the Secretary of Agriculture and the President's Executive Order (EO 14225) on the Immediate Expansion of American Timber Production. Your actions are in clear contradiction to these directives, and I urge immediate compliance.

The Secretary of Agriculture's Memorandum (1078-006) dated April 3, 2025, requires the Forest Service to act swiftly in addressing the wildfire and forest health crisis. The Secretary's directive emphasizes that the Forest Service must increase timber production and sound forest management practices immediately, with an explicit focus on forest management projects that mitigate wildfire risks, improve forest health, and enhance public access to resources. Specifically, the Secretary's Memorandum mandates that the Forest Service streamline processes and implement guidance to expedite timber production, reduce hazardous fuels, and enhance public access to forested lands, including for recreational purposes.

In addition, the Chief of the Forest Service has made it clear that recreation is a critical component of our public land management strategy for local communities. He has stressed the importance of offering recreational opportunities to the American public, particularly in areas like the North Fork Smith Watershed and Kentucky Falls Special Interest Area. By refusing to include and manage these areas for recreation as part of the Smith River Watershed, you are not only disregarding the Chief's direction but also failing to act in accordance with the President's EO and the Secretary's Memorandum, both of which recognize the importance of balancing ecological management with public access and use.

The Secretary's Memorandum also outlines an emergency situation that affects National Forest System lands, including those like the North Fork Smith Watershed. The Forest Service is specifically directed to prioritize actions in these areas to improve resilience to fire, insects, and disease, as well as enhance public access and the sustainable use of forest resources, including for recreation. The failure to implement these directives immediately, particularly the refusal to integrate recreation into the management of these high-value areas, is an unacceptable violation of the mandates you have been given.

The importance of acting without further delay cannot be overstated. As outlined in both the President's EO and the Secretary's Memorandum, the Forest Service has been given the authority and responsibility to take swift,

decisive action to manage these lands for both ecological health and public enjoyment. By continuing to delay or circumvent the management of these areas for timber production and recreation, you are directly contradicting these high-level directives and failing to uphold your responsibilities.

II. Excessive Tree Felling in Riparian Area Conflicts with Wild and Scenic River Values

The project's aquatic restoration plan proposes felling 80 trees per mile directly into the North Fork Smith River and its tributaries. This does not include logs hauled to the river thru the riparian areas. This level of intervention equates to one large tree being cut off the banks of the river/riparian and placed every 66 feet, along miles of one of the most pristine and scenic rivers in the Oregon Coast Range.

This action is:

[middot] The Scenery analysis explicitly states: "No management activities would be implemented along or within the immediate view of the river's banks, in alignment with the more stringent standard for scenic rivers."The cutting of large trees and reforestation of the riparian efforts intended to address damage along the river's riparian areas are entirely absent from the Visual Resource analysis, which violates NEPA's requirement to assess all relevant impacts, including those on scenic quality.

[middot] In direct conflict with the river's nomination for Wild and Scenic designation, which cites "outstandingly remarkable scenic and recreational values";

[middot] A dramatic aesthetic alteration to a river corridor that is actively promoted for hiking, photography, tourism, and scenic driving;

[middot] The Kentucky Falls and North Fork Trails will be impacted and the aquatic restoration plan and the timber harvesting: FW-009 is used to justify the damage of harvest as it states: Generally, do not reduce harvest volume in order to avoid effects on trails. The trail is in a narrow corridor on steep slopes in a Special interest area - the notion that logging damages should prevail in the special interest area is not plausible or in line with the objectives of a special interest area or a Wild and Scenic river.

[middot] Cumulative effects of the large wood placement on any recreation activity including dispersed camping are not addressed in the aquatic analysis and are not supported by the Silviculture analysis.

[middot] The silviculture effects analysis states that tree treatments in the Kentucky Falls Special Interest Area (SIA) and the North Fork Smith River will be carried out solely to "enhance the values" of these areas. The project boundary includes the Kentucky Falls SIA, which features waterfalls and other exceptional water features along Kentucky Creek and the North Fork Smith River, set against a backdrop of deep, undisturbed forest with large, old-growth trees. Density reduction treatments are proposed within the young plantations in the SIA (established prior to its designation); however, these treatments are designed to "enhance the values of the SIA" and do not include plans for ongoing timber harvest. The intended enhancements are meant to support scenic and recreational values, which, under the current plan, are not adequately addressed.

[middot] The silviculture analysis indicates that no fish logs will be cut along the river. The removal and cutting of large trees from the banks and riparian areas is not supported by this analysis. According to the prescription, "Fish logs would be sourced from mature stands along road systems identified on project maps, and no stand-level impacts are anticipated by moving these logs into the drainages below."

[middot] These log placements and similar methods have been applied to the North Fork Smith River repeatedly over the past 20 years, with little success and at significant cost and damage. However, these prior attempts have not been disclosed in the report, nor have the associated costs or impacts of the previous

treatments been considered. This represents an over-manipulation of a natural system. If carried out as proposed, the project would irreversibly damage the scenic and recreational values of the North Fork Smith River, undermining the very qualities that the Wild and Scenic designation aims to preserve.

III. Failure to Include Recreation as a Planning Priority

The project area includes the Kentucky Falls Special Interest Area, a nationally recognized recreation destination. Yet, the Siuslaw National Forest continues to ignore the Chiefs directive and growing public use. Key issues remain unaddressed:

* Trailhead restroom has been closed for years, resulting in unmanaged waste and public health concerns.
* Main access road between BLM and USFS land is severely degraded, restricting visitor access and safety.
* No management plan for e-bikes or OHVs, despite their growing presence and associated trail and road closure impacts.
* Lack of signage and trail locations continues to result in visitor confusion, and public safety, and rescue.
* The purchase of the Davidson tract with the trail along the N.Fk Smith in the Kentucky Falls was designated the main route in the North Fork Trail Environmental Assessment yet this direction has not been followed.
* Sections of the trail and trail bridges need maintenance and reconstruction.
* Rerouting the trail and preventing damage from timber harvesting and log recruitment for fisheries is not addressed.
* Dispersed recreation sites will be eliminated where large trees are cut every 66 feet along the N. Fk Smith River and its tributaries.

These omissions violate the Multiple-Use Sustained-Yield Act and contradict the Forest Service Chief's own national guidance prioritizing recreation and community benefit.

IV. No Site-Specific Analysis - Blanket 20-50 Year Approval Is Unacceptable

The project seeks to authorize specific activities over a 20-50 year period without identifying specific treatment sites, mitigation actions, or cumulative effects. This violates NEPA's core requirement for site-specific analysis prior to decision-making.

The Final EA:

* Does not specify project locations or anticipated extent of disturbance;
* Provides no thresholds or public triggers for when additional NEPA would be required;
* Fails to outline any mechanism for public review, objection, or appeal of future actions.
This is not adaptive management[mdash]it is abdication of public transparency and environmental accountability.V. Failure to Implement the May 2025 National Active Forest Management Strategy -No timber management analysis was included in this document. A list of harvested units is not a Forest Management Strategy.
The National Active Forest Management Strategy is a critical component in fulfilling the directives from Executive Order 14225, Secretarial Memo 1078-006, and the Forest Service Associate Chief's letter on the implementation of Secretarial Memo 1078-006. This strategy outlines priority actions for advancing active forest management under four key areas: Capacity Building and Streamlining Implementation; Environmental Compliance; Shared Stewardship, Partnerships, Contracting, and Markets; and Salvage and Reforestation. However, the proposed project fails to adhere to this comprehensive strategy and undermines long-term forest management planning.
The project as currently designed seeks to bypass essential, long-term timber planning necessary to support rural communities with job creation and other critical benefits. It focuses narrowly on young stand management, as a source of funding; disregarding the broader, law-mandated requirement for a comprehensive, long-term timber harvesting plan, as directed by both law and the Chief of the Forest Service. This limited approach

benefits only a few resources, neglecting the full spectrum of benefits from road safety, recreational access, and other multiple-use objectives for up to 50 years. Additionally, the project proposes 16 miles of road closures that are essential for sustainable forest management. By eliminating these roads, the project also cuts off the possibility of utilizing key resources such as KV funds, Good Neighbor Authority, Stewardship, and other contracts, which are integral to fulfilling the mandates of the Multiple Use Sustained-Yield Act. This failure to implement a holistic forest management strategy undermines both ecological health and the community benefits that active forest management is intended to support.VI. Requested Relief
To address the issues raised in this objection, I respectfully request the Forest Service to take the following corrective actions to ensure compliance with the relevant laws, directives, and the overall mission of responsible forest management:

1. Reevaluate the Timber Harvesting Strategy:
The Forest Service should revise the current project to include a comprehensive, long-term timber management plan that aligns with the National Active Forest Management Strategy and the directives outlined in Executive Order 14225, Secretarial Memo 1078-006, and the Forest Service Associate Chief's letter. This revised plan should ensure that timber harvesting is considered as part of an integrated, multi-resource strategy that supports sustainable rural communities, job creation, and other forest health benefits.
2. Integrate Recreation and Road Access into the Management Plan:
The project should be amended to prioritize recreational access and road safety alongside timber production. It should include provisions for maintaining and improving roads necessary for both forest management and recreational use. The current proposal's narrow focus on young stand management must be broadened to incorporate all aspects of the multiple-use mandate, including recreation, access, and public safety.
3. Address the Wild and Scenic River Values:
The Forest Service must reconsider the proposed excessive tree felling in the North Fork Smith River corridor. As outlined in the objection, the current plan to fell 80 trees per mile is not supported by sufficient scientific analysis or visual impact studies. The project should be revised to minimize the impact on the scenic and recreational values of the Wild and Scenic River corridor, ensuring that the restoration efforts do not jeopardize the river's outstandingly remarkable values.
4. Streamline Environmental Compliance and Implementation:
In line with the National Active Forest Management Strategy, the Forest Service should streamline its environmental compliance processes to reduce unnecessary delays. The project should adhere to the legal requirements for site-specific environmental analysis, and the Forest Service should establish clear thresholds for when additional reviews, including NEPA, will be required for future actions.
5. Ensure Public Involvement and Transparency:
The Forest Service must establish a formal, transparent public process for the future stages of the project. This process should include opportunities for public review, comment, and objection to future actions, particularly in relation to road closures, trail maintenance, and recreation management. An adaptive management framework should be implemented to ensure ongoing stakeholder engagement throughout the life of the project.
6. Reinstate Funding and Authorities for Multiple Use:
The Forest Service should reinstate the use of funds and authorities such as Good Neighbor Authority, Stewardship, and KV funds, which are critical for supporting multiple-use management objectives, including recreation, fire risk reduction, and forest health restoration. These tools are essential for maintaining the balance of ecological and community needs, and their exclusion undermines the project's compliance with the Multiple-Use Sustained-Yield Act.

By implementing these actions, the Forest Service will ensure that the project is in compliance with all relevant directives, including the Chief's guidance on recreation and forest health, as well as the priorities set forth in the Executive Order and Secretary's Memorandum. These revisions will provide a balanced, sustainable approach to forest management that benefits both the environment and local communities.

V. Standing

I meet the requirements for standing under 36 CFR [sect] 218.5 as I submitted timely and specific comments related to the project. This objection directly relates to those comments and expands on new issues introduced in the final decision.

The Siuslaw National Forest is not an isolated entity, and it should have already aligned with the directives established by the new Chief. Attempting to justify or bypass necessary changes by citing the proposal's origins prior to the new directive only demonstrates a lack of flexibility and accountability in the Siuslaw leadership. As Chief Tom Schultz stated, "I want healthy, respectful dissent, but once a decision is made, I believe we must follow through together and hold ourselves accountable."This approach is essential for fostering progress and ensuring that the Forest Service remains responsive and responsible in its management practices.

Thank you for your consideration. I strongly support thoughtful, site-responsive restoration that protects and enhances the full range of public values, including forest management, scenic integrity, recreation, safety, and ecological health.

Sincerely,

Mark Buehrig USFS Volunteer

References cited: R6 Regional Office

1. Attachments Executive Order " Immediate Expansion of American Timber Production, March 1, 2025

1. SECRETARY'S MEMORANDUM 1078-006 April 3, 2025 "INCREASING TIMBER PRODUCTION AND DESIGNATING AN EMERGENCY SITUATION ON NATIONAL FOREST SYSTEM LANDS"

1. The National Active Forest Management Strategy, May 2025 (Fulfills direction from Executive Order 14225, Secretarial Memo 1078-006, and the Forest Service Associate Chief 's letter on implementation of Secretarial Memo 1078-006.)

4. Chief Tom Schultz -Vision and Directive to Employees and Public-March, 2025